

January 24, 2000

OBSERVATION REPORT #15

KPMG experienced a discrepancy regarding the timeliness of Bell Atlantic's bill delivery.

Issue 15.1

KPMG's understanding of Bell Atlantic's delivery process for paper bills is that the CLEC should receive a bill within 10 business days of the bill date. This was communicated to KPMG by BA personnel in an interview in November 1999. Also refer to *BA's Compliance Filing – NY State Carrier to Carrier Guidelines for Performance Standards and Reports* (Metric #BI-2, dated November 15, 1999) for documentation of this metric.

Given this standard, KPMG received three bills significantly beyond this timeliness metric:

Bill Type	Bill Number	Bill Date	Postmark	KPMG Receipt Date
Abbreviated	508 Q05-1035 135	11/30/99	1/5/00	1/10/00
Administrative	508 Q10-0068 068	12/4/99	1/5/00	1/10/00
Abbreviated	508 Q05-0136 136	12/18/99	1/15/00	1/24/00

It appears that BA had incorrect billing addresses for these bills, despite several requests by KPMG since 10/29/99 asking BA to correct the addresses. The table above outlines when KPMG received those bills.

Issue 15.2

KPMG's understanding of Bell Atlantic's delivery process for bills via NDM or CD ROM is that the CLEC should receive a bill within 10 business days of the bill date. Please refer to *BA's Compliance Filing – NY State Carrier to Carrier Guidelines for Performance Standards and Reports* (Metric #BI-2, dated November 15, 1999) for documentation of this metric.

The following table outlines bills KPMG expected to receive via NDM but has not yet received:

Bill Type	Bill Number	Bill Date	Bill Media
Resale Sub-Account	508 Q05-0136 136	12/15/99	NDM
Y40	617 Y40-0013 156	12/6/99	NDM

The following table outlines bills KPMG received via NDM, but were sent later than as prescribed in the timeliness standard:

Bill Type	Bill Number	Bill Date	Date Sent by BA
Y40	413 Y40-0014 104	12/6/99	1/14/00
M40	617 M40-0021 673	12/4/99	1/14/00

With regard to bills sent on CD ROM, KPMG has not yet received the following expected resale bill:

Bill Type	Bill Number	Bill Date	Expected Arrival Date
Resale Sub-Account	508 Q05-0135 135	12/31/99	1/19/00

Assessment

If CLECs do not receive their bills in a timely manner, they will be unable to bill end user accounts in a timely manner.